

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
	)	
JOANN INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Re: Docket No. 1070</b>

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’  
FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)  
(Reclassified Claims)**

---

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On June 4, 2025, the *Debtors’ Fifth Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1070] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was June 25, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. Prior to the Response Deadline, the Debtors received an informal response to the Objection and Proposed Order from Rosenthal & Rosenthal, Inc. (“Rosenthal”).

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. Additionally, prior to the Response Deadline, the Debtors received a formal response to the Objection and Proposed Order from Notions Marketing Corporation [Docket No. 1281] (the “Notions Response”).

5. The Debtors have not received any other informal or formal responses to the Objection and Proposed Order.

6. To resolve Rosenthal’s informal response,<sup>2</sup> the Debtors and Rosenthal agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

7. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

---

<sup>2</sup> The unresolved Notions Response has been adjourned to the omnibus hearing currently scheduled for August 14, 2025 at 10:00 a.m. (prevailing Eastern Time).

Dated: July 9, 2025  
Wilmington, Delaware

*/s/ Michael E. Fitzpatrick*

---

**COLE SCHOTZ P.C.**

Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Michael E. Fitzpatrick (No. 6797)  
Jack M. Dougherty (No. 6784)  
500 Delaware Avenue, Suite 600  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: preilley@coleschotz.com  
snewman@coleschotz.com  
mfitzpatrick@coleschotz.com  
jdougherty@coleschotz.com

*Co-Counsel to the Debtors  
and Debtors in Possession*

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
Aparna Yenamandra, P.C. (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: joshua.sussberg@kirkland.com  
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)  
Jeffrey Michalik (admitted *pro hac vice*)  
Lindsey Blumenthal (admitted *pro hac vice*)  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: anup.sathy@kirkland.com  
jeff.michalik@kirkland.com  
lindsey.blumenthal@kirkland.com

*Co-Counsel to the Debtors  
and Debtors in Possession*